

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
 : **CASE NO. 18-10316-jkf**
Kathleen Morgan :
 : **CHAPTER 13**
Debtor. :
 : **Objections Due: April 30, 2018**
 : **Hearing Date: May 16, 2018 at 9:30 a.m.**
 :

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY
UNDER SECTION 362 OF THE BANKRUPTCY CODE**

TO: Parties listed on the Certificate of Service

The Movant Geoffrey Scott has filed a Request for a Status Conference and a Motion for Relief from Automatic Stay which seeks the following relief: relief from the automatic stay for the limited purpose of renewing his Judgment Lien secured by the real property located at 9 West Shore Court, Somerset Lake, Lot #1055, New Garden Township, Chester County, PA.

HEARING ON THE MOTION WILL BE HELD ON May 16, 2018 AT 9:30 a.m. before the Honorable Jean K. FitzSimon at the United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107, Courtroom #3.

ANY RESPONSE MUST BE FILED AND SERVED TOGETHER WITH A CERTIFICATE OF SERVICE ON OR BEFORE APRIL 30, 2017. FAILURE TO TIMELY FILE AND SERVE A RESPONSE WILL RESULT IN AN ORDER GRANTING THE RELIEF REQUESTED IN THE MOTION.

At the same time, you must also serve a copy of the response upon Movant's attorney:

Jason C. Manfrey, Esquire
Fox Rothschild LLP
2000 Market Street, 20th Floor
Philadelphia, PA
Philadelphia, PA 19103

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing as determined by the Court.

The attorneys for the parties shall confer with respect to issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE RELIEF DEMANDED BY THE MOTION WILL BE GRANTED.

Respectfully submitted,

Dated: April 16, 2018

/s/ Jason C. Manfrey

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Counsel for Movant, Geoffrey Scott